

EXHIBIT 2

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T2 Some of this prompted by AG filing as not far requests as much
MOL & Sui's telling us that ENR coming up at trial, everyone will
know

Want to be comfortable w/ facts

Why needed:

Arise Lazarus - public filings where AL listed as affiliated person of
FNV

Public filings - have to list any individual as Director

AL listed as ~~some~~ director for some companies

But AL not a director

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Fokin: tells story + ~~testimony~~ - can we prove/disprove?

Director for ENR, don't work for Deripaska
Project was to gather intel for NorNickel litigation
Got request from security department, goes to CM
Sheshtakov a nobody - means to get CM

Fokin - ENR employee for 12 years

- Analyzing int'l issues, political risks, hinder cooperation w/ foreign corps
- Salaries especially 2019-2021

Never worked for Deripaska → not sure if that's just paycheck

Reports to CEO - 2019-2021

ENR paid for trips to US, including trips where he met w/ CM
Reports met CM in May 2019 through SS (Knew SS since 90s)

Friendship b/w SS & EF

CM proposes delisting OD → EF says involvement limited to introduction
CM proposes hiring Fokin to Kirk, brings EF to Kirk office

Denies introducing Kirk to OD → passed on contact to Gregory Ogarev

Meeting in London → SS not invited: CM, SB, EF, OD, GO

EF doing the handoff for delisting → not sure if ENR paid for travel
GO handled from that point forward

EF doesn't know why engagement concluded → Covid, GO dies

2021 - Fokin, on behalf of ENR/Rusal, approaches CM for NN research

Got assignment from Alexander Osminin - Deputy CEO / head of security

Went to CM b/c attractive + experienced w/ work w/ Russians

Negotiated contract w/ Osminin's consent, Osminin ultimately approved

Other employees worked w/ AL to execute contract

Denies hiring SS → did not regard SS as useful - understands SS was around / involved

CM does work from Aug. - November

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Nov. 2021 - SS/cor disappear

Work was substandard, not useful

Discussed w/ Geminin

Tried to sell dark web files → EF thought laughable

Pushed cor to finish "phase one"

No contact w/ Aaron Neza / doesn't know what London is

No contact w/ Arina Lazaran

Ogema lived from Covid in 2021

Geminin died of cancer in 2023 → got death records

Company View

London - not an ENT subsidiary or affiliate or vendor or service provider
Some entities had w/in ENT group had relationships at some point
→ surprised at SS registration

Not w/ ENT itself, ENT doesn't have the records
Some connection / relationship → don't know timeframe

AL is an affiliated person

Lazaran has acted as director of fused company over the years

Don't know her relationship w/ London

Try to figure this out w/ company

Docs

Travel records for Fokem - Fokem submitted agendas + expense reports
Paid for trips → no references to SS / ~~cor~~ (references to other meetings)

Issues:

Russian Law issues -

Environment where people don't want to talk

Sensitive nature of project - no EF said would never email about project for security project → text / print

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EF

EF says company had suffered hacks
And deleted apps - EF has not provided device
Investigating JV partner - instruction to keep in strictest confidence
Huge problems if found out
didn't say yes or no to existing messages

Getting former counsel, hasn't indicated he wants one
Took time to get access to EF
for BRF

Nobody @ BRF discussed R. IS w/ him

Trying to get access to people who legal legal who were working on
NonNiche litigation → to see if we can credit EF or not
Privilege issues

